

Message

From: Niebling, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0486BD965B1842E8A43D2E68BFC8C198-NIEBLING, W]
Sent: 2/2/2022 2:10:07 AM
To: Carlson, Stephanie (Ernst) [Stephanie_Carlson@ernst.senate.gov]; joe_gilson@grassley.senate.gov
CC: Snyder, Rodney [Snyder.Rodney@epa.gov]; Levine, Carolyn [Levine.Carolyn@epa.gov]
Subject: Call follow up

Hi –

On a recent call with Administrator Regan, Senators Grassley and Ernst expressed interest in a question about reporting of drift incidents from Iowa. Below is a response our program developed as the Administrator asked us to do. Please let us know if you have any questions.

Best,
William

The Agency compiled incident reports for Iowa and other states from multiple sources for the 2021 growing season through November 17, 2021 and found that widespread incidents continued in 2021. It was generally assumed that cases were not duplicative, unless conclusively shown to be so by date, place, or particular circumstances. The Agency excluded duplicate reports when feasible; however, because the details provided by the different sources varied, there remains a possibility of double counting. While it is possible that an incident may have been reported by more than one source, there is overwhelming and long-standing evidence of underreporting of incidents (see EPA documents: [Chism et al., 2020](#), see Section V; [Tindall et al., 2021](#), see section 5.10). For instance, EPA's 2020 impacts assessment (Chism et al., 2020) cited a 25-fold underreporting rate based on dicamba-related incidents in soybean surveyed in the U.S. Department of Agriculture's (USDA) 2018 Soybean Agricultural Resource Management Surveys (ARMS). Information gathered by the Agency through stakeholder meetings indicated that underreporting also occurred in 2021. It is difficult to determine the magnitude of double counting and underreporting. The magnitude of underreporting is likely to exceed the magnitude of double counting as there is no universal or mandatory duty for private citizens to report incidents and there is documented reluctance to report incidents. Additionally, at the time of the completion of the Agency's 2021 incident assessment, some states were not finished with their investigations for the 2021 season, so the number of incidents reported to the Agency may change nationally and/or by state.

Iowa-specific sources include:

- Data submitted from Corteva, Bayer, and BASF as part of their legal obligation to report incidents to the Agency under FIFRA section 6(a)(2).
- Information from individuals representing the state of Iowa at a meeting with AAPCO, including follow-up communication after the AAPCO meeting
- Reports from Extension/academic researchers from Iowa universities at a meeting between university personnel and EPA, popular press (Unglesbee, 2021b-c), social media posts (Hartzler, 2021)
- Unglesbee 2021c (citing an IA university researcher) alludes to underreporting in Iowa specifically.
- Chism et al. (2020) cited Ricchio (2018), a Master thesis from the University of Iowa, conducted a survey about pesticide drift in the mid-west. Ricchio (2018) found that 54% of Iowa respondents did not know how to report the drift incident in their state.
- Communications from staff in EPA Region 7
- Other sources submitted directly to the Agency (e.g., Stine Seed)

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